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6 Attorneys for Defendants TRAVELERS INDEMNITY
COMPANY OF CONNECTICUT and THE TRAVELERS
7 INDEMNITY COMPANY

8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**

10
11 THE MICHEL FAMILY TRUST,

12 Plaintiff,

13 vs.
14 TRAVELERS INDEMNITY COMPANY
15 OF CONNECTICUT, THE TRAVELERS
INDEMNITY COMPANY, and DOES 1 to
100, inclusive,

16 Defendants.
17

CASE NO. C09-04144 PVT

STIPULATION TO CONTINUE DATE
FOR FILING MOVING PAPERS FOR
DISPOSITIVE MOTIONS;
[PROPOSED] ORDER THEREON

18
19 TO THE HONORABLE PATRICIA V. TRUMBULL, U.S. DISTRICT COURT MAGISTRATE
20 JUDGE:

21 **STIPULATION**

22 WHEREAS, Plaintiff MICHEL FAMILY TRUST and Defendants TRAVELERS
23 INDEMNITY COMPANY OF CONNECTICUT and THE TRAVELERS INDEMNITY
24 COMPANY (“Travelers”) desire to extend the time for Travelers to file a motion for summary
25 judgment, without changing the hearing date or any other dates for filing opposition or reply
26 papers, on the following grounds:

27 1. Counsel for both parties have diligently worked to schedule percipient depositions,
28 but because of delays in document productions and scheduling depositions, Travelers has been

prevented from meeting the existing August 10, 2010 deadline for filing its motion for summary judgment; and

2. This will not affect the last day for hearing dispositive motions in this matter.

NOW, THEREFORE, by and through their undersigned counsel of record, Plaintiff MICHEL FAMILY TRUST and Defendants TRAVELERS INDEMNITY COMPANY OF CONNECTICUT and THE TRAVELERS INDEMNITY COMPANY hereby stipulate to the following:

1. The last day for Travelers to file and serve its motion for summary judgment shall be August 17, 2010;

2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for summary judgment shall be August 24, 2010;

3. The last day for Travelers to file and serve its reply papers in support of its motion for summary judgment shall be August 31, 2010; and

4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

Respectfully submitted,

DATED: August 6, 2010

FORAN GLENNON PALANDECH PONZI & RUDLOFF PC

By: /s/ Marjie D. Barrows
Marjie D. Barrows

Attorneys for Defendants
**TRAVELERS INDEMNITY COMPANY OF
CONNECTICUT and THE TRAVELERS
INDEMNITY COMPANY**

DATED: August 6, 2010

WILLIAMS, PINELLI & CULLEN, LLP

By: /s/ Amy Carlson
Amy Carlson

Attorneys for Plaintiff
MICHEL FAMILY TRUST

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ORDER

IT IS HEREBY ORDERED, pursuant to the Stipulation of the parties, as follows:

1. The last day for Travelers to file and serve its motion for summary judgment shall be August 17, 2010;

2. The last day for Plaintiff to file and serve its opposition to Travelers' motion for summary judgment shall be August 24, 2010;

3. The last day for Travelers to file and serve its reply papers in support of its motion for summary judgment shall be August 31, 2010 ; and

4. The last day for a hearing on dispositive motions shall remain September 14, 2010.

Date: August 9, 2010

Patricia V. Trumblall

PATRICIA V. TRUMBULL
UNITED STATES MAGISTRATE JUDGE